

# PAUL HASTINGS

January 10, 2024

**Via Email to Chambers**

Hon. Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 23A  
New York, NY 10007

**Re: *United States v. Robert Menendez et al.*, No. 23 Cr. 490 (SHS)**

Dear Counsel:

We represent Senator Menendez in the above-captioned matter. Pursuant to Paragraph 6 of the Court's Protective Order in this case (ECF 55), we respectfully request the Court's permission to file certain papers submitted in connection with Senator Menendez's First Motion to Dismiss the Indictment (the "Motion") under seal. In particular, Senator Menendez seeks to file his Memorandum of Law in Support of the Motion (the "Memorandum") under seal, with a redacted copy on the public docket, and to file the Declaration of Avi Weitzman in Support of the Motion and Exhibits A and B attached thereto (the "Sealed Exhibits") under seal. The basis for the sealing request is that the redacted portions of the Memorandum either quote from or describe the contents of "Protected Material" as that term is defined in the Protective Order in this matter. *See* ECF No. 55. Likewise, the attachments to the Weitzman Declaration are themselves Protected Material pursuant to the Protective Order, and accordingly, we are required to file them under seal.

Respectfully submitted,

/s/ Avi Weitzman  
Avi Weitzman  
Adam Fee  
Robert Luskin

*Attorneys for Defendant Robert Menendez*